

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

1. VALERIE EASLEY,)	
)	
Plaintiff,)	
v.)	Case No.: CIV-20-540-G
)	
1. THE UNITED STATES OF AMERICA; and)	
2. DESTINY HAGANS;)	
)	
Defendants.		

COMPLAINT

COMES NOW Plaintiff, Valerie Easley, by and through the undersigned and for her cause of action, alleges and states:

1. Jurisdiction is vested in this Court pursuant to 28 U.S.C. § 1331.
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a)(1).
3. On or about April 19, 2019, Plaintiff, Valerie Easley, was involved in a motor vehicle collision with automobiles driven by Theodore W. Burzynski and Destiny Hagans. The collision occurred near the intersection of I-44 W/B and Pennsylvania, City of Oklahoma City, and County of Oklahoma, Oklahoma.
4. While operating the motor vehicle, Burzynski was within the course and scope of his employment with the United States of America as an employee of the Federal Aviation Administration. Therefore, the United States of America is responsible for his negligence pursuant to the Federal Tort Claims Act codified at 28 USC §2674, et seq.
5. Defendant The United States of America, through its agent, servant, and/or employee, is negligent *per se* for causing the injuries to Plaintiff Valerie Easley.
7. That as a result of this Defendants' negligence, Plaintiff has incurred medical expenses, loss of earnings, physical pain and suffering, mental pain and suffering, and property damage.

8. That Plaintiff submitted a Federal Tort Claim Notice to the United States of America on or about October 28, 2019, and her claim has been deemed denied by operation of law per 28 USC §2675.

9. That as a result of the above-referenced acts, the Plaintiff has been damaged in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiff, Valerie Easley, pray for judgment against the Defendants, in an amount in excess of \$75,000.00, plus interest, costs, and all other relief this Court deems just and equitable.

Respectfully submitted,

GRIFFIN, REYNOLDS & ASSOCIATES

/S/ Jason B. Reynolds

Jason Reynolds, OBA No. 18132

Billy Griffin, OBA No. 17945

210 S.E. 89th Street

Oklahoma City, OK 73149

(405) 721-9500

(405) 721-9503 Facsimile

ATTORNEYS FOR PLAINTIFF

ATTORNEY LIEN CLAIM
JURY TRIAL DEMANDED